

EXHIBIT SW-08

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SYLVIA SPENCER, VICKI HULSE and TED
YOUNGBERG,

Plaintiffs,

vs.

WORLD VISION, INC.,

Defendant.

NO. C07-1551 RSM

**DECLARATION OF STEVEN T.
O'BAN**

I, Steven T. O'Ban, declare and state:

1. I am an attorney with Ellis, Li & McKinstry PLLC, which represents the Defendant World Vision, Inc. I am over the age of 18 and competent to make this Declaration.

2. Attached as Exhibit 1 is a true and correct copy of the deposition of Kathleen Evans.

3. Attached as Exhibit 2 are true and correct copies of pages from the deposition of Vicki Hulse.

4. Attached as Exhibit 3 are true and correct copies of pages from the deposition of Sylvia Spencer.

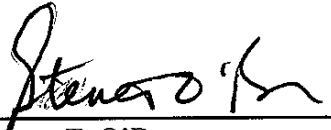
DECLARATION OF STEVEN T. O'BAN
(No. C07-1551) - 1

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1 5. Attached as Exhibit 4 are true and correct copies of pages from the deposition of
2 Ted Youngberg.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 EXECUTED this 29th day of February, 2008 in Seattle, Washington.

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8 _____
9 Steven T. O'Ban

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DECLARATION OF STEVEN T. O'BAN
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EXHIBIT 1

Page 2

1 APPEARANCES:

2 For the Plaintiff: JUDITH A. LONNQUIST
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16 EXAMINATION INDEX

17 WITNESS:

18 KATHLEEN M. EVANS
 19 EXAMINATION BY: Page
 20 MS. LONNQUIST 4 - 116
 21 MR. O'BAN 116 - 117
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1 EXHIBIT INDEX

2 No. Description Page
 3 1 NOTICE OF 30(b)(6) DEPOSITION 5
 4 2 EXCERPT FROM 2006 ANNUAL REPORT 44
 5 3 LETTER TO MR. O'BAN FROM MS. 117
 6 LONNQUIST DATED 1/31/08
 7
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Page 4

1 SEATTLE, WASHINGTON; TUESDAY, FEBRUARY 19, 2008

2 10:00 a.m.

3 -- OO O OO --

4 KATHLEEN M. EVANS, having been duly sworn,
 5 testified under oath

6 as follows:

7 EXAMINATION

8 BY MS. LONNQUIST:

9 Q. Would you state your full name for the record,
 10 please?

11 A. Kathleen Mary Evans.

12 Q. And your home address?

13 A. 1516 55th Court Southeast. That's in Auburn,
 14 Washington, 98092.

15 Q. And are you employed with World Vision?

16 A. Yes, I am.

17 Q. What is your position?

18 A. I'm Vice President of Strategy and Integration.

19 Q. And how long have had held that position?

20 A. Since 2005.

21 Q. Have you ever had your deposition taken before?

22 A. No, I haven't.

23 Q. I'm sure Mr. O'Ban has explained the procedure to
 24 you, but I'm going to give you my spin on it.

25 The court reporter takes down everything said in

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1 this room, so please try not to speak over me even if you
 2 know how my question is going to end. Wait until it's
 3 finished before you respond. And because he's taking
 4 everything down, nodding your head won't work. You have
 5 to answer audibly.

6 A. Okay.

7 Q. And if at any time you don't understand a question or
 8 you feel you can't answer the question as I've phrased it,
 9 just let me know and I'll rephrase it. Otherwise, if you
 10 don't do that, I will assume that you've understood the
 11 question and answered it accordingly.

12 A. All right.

13 Q. If at any time you want to take a break, that's fine.
 14 We can certainly do that. The only requirement is that
 15 you answer the pending question before we take a break.

16 MS. LONNQUIST: I'm going to mark as
 17 Exhibit #1 the 30(b)(6) notice of deposition.

18 (Exhibit #1 was marked for identification.)

19 Q. (By Ms. Lonnquist) Have you seen Exhibit #1 before,
 20 Ms. Evans?

21 A. No, I haven't.

22 Q. Has it been explained what a 30(b)(6) deposition is?

23 A. Not in technical terms.

24 Q. Do you understand that you are representing --

25 A. Oh, I have seen this document, yes.

2 (Pages 2 to 5)

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1 A. Probably, yes. That could be an example, mm-hmm.
 2 Q. Agriculture and livestock, what does this program do?
 3 A. So that might be helping folks till the ground, grow
 4 food, grow crops in a different way depending on, again,
 5 what the context is for their locale.
 6 And livestock might be how to grow or breed
 7 livestock either for their material needs, or possibly
 8 even to sell them to earn a livelihood.
 9 Q. And, again, the recipients aren't selected based on
 10 religion?
 11 A. No, but we're still able to integrate our full suite
 12 of services in those communities unless it's government
 13 restricted.
 14 Q. HIV/AIDS care is a program?
 15 A. Mm-hmm.
 16 Q. In that a yes?
 17 A. Yes, sorry, I keep forgetting.
 18 Q. And you don't select the recipients of this care on
 19 the basis of their religion?
 20 A. No.
 21 Q. In fact, tending to these people, many of the
 22 recipients are homosexuals, aren't they?
 23 A. Not necessarily. In Africa most of the reason that a
 24 person would have HIV/AIDS might be some kind of cultural
 25 practice where multiple marriage partners but heterosexual

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1 might be literally a mother who has HIV/AIDS or HIV and
 2 has given that virus to her child when it was born. So,
 3 no, I would not characterize it as solely a homosexual.
 4 Q. It's true, is it not, that World Vision has a policy,
 5 a standard of conduct that regulates or seeks to regulate
 6 sexual conduct outside of a monogamous heterosexual
 7 marriage relationship?
 8 MR. O'BAN: I'm going to object. That's
 9 beyond the scope of this deposition.
 10 MS. LONNQUIST: No, it's not. It goes
 11 to the distribution of funds. It's preliminary.
 12 MR. O'BAN: What?
 13 MS. LONNQUIST: It's preliminary to the
 14 distribution of funds, which is part of this.
 15 MR. O'BAN: Could you read the question
 16 back, please?
 17 (The question was read back as requested.)
 18 MR. O'BAN: Are you speaking of an
 19 employment-related policy, or are you talking about --
 20 MS. LONNQUIST: She can answer that,
 21 because I don't know.
 22 MR. O'BAN: Well, I'll object. It's
 23 vague and unclear.
 24 Q. (By Ms. Lonnquist) Go ahead, you may answer.
 25 A. My understanding is that is a staffing-related code

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1 of conduct. That does not relate to beneficiaries of our
 2 program services.
 3 Q. Fine, thank you.
 4 The next program is education, and it's described
 5 as including supplies, education for orphans, job training
 6 for women and girls.
 7 Is there something more to that program?
 8 A. Could you repeat the subsets?
 9 Q. Sure. It includes supplies, education for orphans,
 10 job training for women and girls.
 11 A. Well, again, I would say those are examples. We
 12 could provide education for kids who are not orphans, and
 13 we could provide education in a multitude of different
 14 categories, life skills, training, economic, social,
 15 spiritual, any of those areas.
 16 Q. Now, you used the term spiritual. Do you distinguish
 17 between religious on one hand and spiritual on the other?
 18 A. Do I distinguish between religious and spiritual?
 19 No, I don't think when I use it I distinguish.
 20 Q. Anything else with respect to the education programs
 21 that you run?
 22 A. Well, I suppose this could come under supplies, but
 23 we might provide curriculum or books, and that would be
 24 under the category of supplies. So, again, I think
 25 there's broader descriptions that don't fit the space on

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1 the Internet site.
 2 Q. And, again, you don't select the recipients based on
 3 their religion?
 4 A. No. We don't select the participants that way.
 5 Q. Now, this program is just on the Internet, but it's
 6 not defined: Girls and women.
 7 A. Well, just generally speaking, in poverty girls and
 8 women are often very negatively affected in the various
 9 communities either because of culture or belief systems in
 10 different countries, and it could manifest itself in
 11 different ways depending on the country.
 12 So that's an intentional call-out of saying that
 13 we need to especially serve the girl child and the woman
 14 in helping actually the overall family's well-being to get
 15 better. And again, it could be a multitude of examples of
 16 activities that we would undertake with that stakeholder
 17 group.
 18 Q. Now, those are the 12 that I saw listed on the
 19 Internet. You added relief response. What is that
 20 program?
 21 A. Well, that could be, again, a hurricane comes and
 22 some of those previously identified items, housing or
 23 trauma counseling or clothing, et cetera, medical support,
 24 might be provided under that umbrella. Whatever's needed,
 25 physical, spiritual, emotional, social in that setting

25 (Pages 94 to 97)

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1 would come under a relief umbrella.
 2 Q. Partnership with churches is another one you added?
 3 A. Right.
 4 Q. What does that involve?
 5 A. So that would be specifically where we're trying to
 6 advocate with the church to understand the full scope of
 7 the nature of poverty and get them involved with us,
 8 because we believe our mission is their mission. So
 9 advocacy would be a program activity, and also to partner
 10 with them, to actually work with them to undertake our
 11 specific programs.
 12 They may have more people in the locales that
 13 we're working in that can come in and, again, lead some
 14 kind of a Bible-based curriculum related to the poverty
 15 need in that community. They might participate with us in
 16 training of our own staff, spiritual formation of our own
 17 staff, or vice versa, our staff are trying to help boost
 18 up their spiritual strength, Christian in our case. So it
 19 could be any of those kinds of examples.
 20 Q. And the partnership with churches are only Christian
 21 churches?
 22 A. Yes.
 23 Q. And then the last one that you --
 24 A. Well, let me actually take that back. If we're in a
 25 predominantly Muslim community, we would still want to

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1 partner with Christian churches for purposes of preparing
 2 Christian curriculum and so forth, but we might partner
 3 with Muslims in the community because they're the
 4 predominant population and we need to cooperate with them
 5 somehow. We would just, again, take care to ensure that
 6 that wasn't taking away from our Christian mission, but
 7 was helping the community in whatever needs that that
 8 could be appropriate. So I guess in that case --
 9 Q. So you could partner with a mosque?
 10 A. We could partner with individuals from -- yeah.
 11 Q. With the mosque or with the emmon?
 12 A. It could be any of those. An emmon might be the most
 13 revered person in the community. And for us to be able to
 14 work in that community, we would at least have to have an
 15 understanding of relationships in that community, what
 16 works well, what doesn't in that community. And if we're
 17 arrogant and just stomp all over that, we would probably
 18 get kicked out of the community and lose our witness.
 19 Q. And would the same be true in Buddhist countries for
 20 Buddhist temples?
 21 A. Yes.
 22 Q. Do you do work in Israel?
 23 A. Yes, in the Palestine area, mm-hmm.
 24 Q. So do you partner with temples and rabbis?
 25 A. I assume. I don't know the specifics of that

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1 particular program.
 2 Q. But there's nothing in the way you carry out your
 3 program that would prohibit you from doing that?
 4 A. No, so long as we can fulfill our full scope of
 5 mission and not feel like we're being limited by that
 6 external situation.
 7 Q. And then the last program that you added was public
 8 awareness. What does that involve?
 9 A. Well, that would include our fundraising. Every time
 10 we go out and do fundraising, we're undertaking some
 11 aspect of a public awareness ministry, because sometimes
 12 folks just don't understand the nature of poverty.
 13 A good example that you used earlier was when we
 14 first started building HIV/AIDS programs. The church
 15 community thought exactly what you said, isn't that a
 16 homosexual illness you get from sin? And we literally had
 17 to go into the church and show them that, no, it's not
 18 always happening because of that reason.
 19 And we as Christians must fulfill what Christ
 20 taught us to do, to care for folks like this, and that's
 21 part of our call. So that would be an awareness activity
 22 that we need to undertake to fulfill the mission.
 23 Q. So let's go back to each of these programs now,
 24 because I want to try to divy up your budget according to
 25 these programs. Do you think you can do that?

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1 A. I don't think I can in numbers, but I could go get
 2 some things for you. Well, go ahead and ask questions,
 3 and I'll tell you what I think.
 4 Q. So I had 12 and you added three, so there are 15
 5 major program areas.
 6 A. Mm-hmm.
 7 MR. O'BAN: I have a standing objection
 8 to this because she talked about the interlapping nature
 9 of these functions between the different categories, but
 10 go ahead.
 11 Q. (By Ms. Lonnquist) Poverty in the United States, what
 12 percentage of the pie of the --
 13 A. Well, we could get that from the Exhibit #2 here. So
 14 it's the 71 million, plus the 7 million would be program
 15 in the United States.
 16 Q. And you said there's some government funds, but not
 17 many --
 18 A. Not very much.
 19 Q. (Continuing) -- in this program. Can you --
 20 A. It's less than a million dollars, yeah.
 21 Q. The micro enterprise development, what percentage of
 22 the revenue goes to that?
 23 A. Yeah, I would say for anything, as I recall your
 24 list. I could not give you a dollar amount. And again,
 25 they're not mutually exclusive categories.

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1 Q. Do you have something that shows how much you
 2 invested in each one of these program areas during the
 3 year?
 4 A. Not necessarily in a --
 5 Q. In any format.
 6 A. In some formats, yes, but not in a way that I would
 7 feel is a true representation of buckets of categories.
 8 Because we're integrating our work so much, some
 9 categories don't get detailed out in the summary records
 10 that we get.
 11 Q. So what could you do? You could say cash money
 12 attributed? A percentage? What?
 13 A. Well, you could certainly start with the second
 14 detail page that's underneath this summary page that you
 15 referred to in Exhibit #2 in the annual report.
 16 Q. And that's on the Web?
 17 A. And that's on the Web, and it's actually part of the
 18 audit report, but those are pretty high-level categories
 19 still.
 20 Q. How about for children sponsorship?
 21 A. Yes, sponsorship is a special line item on that.
 22 Q. And how big is that program monetarily?
 23 A. Well, this was in 2006. It's 166 million dollars, so
 24 it's going to be bigger in 2007.
 25 Q. If I were looking for the money expended in each of

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1 these 15 program areas, is that where I'd find it, the
 2 second detail page?
 3 A. No. It doesn't detail down to that level.
 4 Q. Well, in any one given year from a monetary
 5 expenditure point of view, what's the biggest program that
 6 you run?
 7 A. I don't know. I'd have to go underneath and unpack
 8 it a little bit, but I would say -- and again, because the
 9 categories are not -- we just don't track them, so I would
 10 combine -- like, for instance, let me give you just kind
 11 of a general example so you know what I mean.
 12 Child sponsorship and some of the relief and
 13 development work that's just at this high level of program
 14 services are doing similar kinds of work. They could be
 15 health work. They could be education work. They could be
 16 Christian witness work, but we don't -- we don't keep
 17 track of all those subsets underneath the child
 18 sponsorship components. We literally have to go back
 19 project by project to see the subcomponents.
 20 Q. Can you recall what is on the second detail page?
 21 MR. O'BAN: Well, we produced this to
 22 you, Counsel.
 23 MS. LONNQUIST: This page is all I have
 24 (indicating).
 25 MR. O'BAN: All right.

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1 A. Yeah, it's part of the annual report, the audit
 2 report, the external audit report.
 3 Q. (By Ms. Lonnquist) And how is it broken down under
 4 program services?
 5 A. It would list these categories with details
 6 underneath like the salary components and whether it's
 7 international and domestic, et cetera.
 8 Q. Do you know how much revenue annually goes to support
 9 the youth Bible curriculum?
 10 A. No, but we could find out.
 11 Q. Would it be in this detail page?
 12 A. No.
 13 Q. It wouldn't be?
 14 A. No.
 15 MS. LONNQUIST: We'll put that on the
 16 list.
 17 Q. (By Ms. Lonnquist) And you could provide a dollar
 18 figure for the expenditures in the youth Bible program
 19 curriculum?
 20 A. Yes.
 21 Q. And could you also provide an annual dollar figure
 22 for providing Bibles to impoverished countries?
 23 A. Not necessarily, because it could be subsets across
 24 several projects.
 25 Q. How about selling the Faith in Action Study Bible?

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1 A. Yeah, we might have some stats on sales. Of course,
 2 they're sold through book publishers all over the place,
 3 so World Vision isn't the sole --
 4 Q. Exclusive?
 5 A. Yeah.
 6 Q. Is there any document either on the Web or that you
 7 can provide us that shows what kind of staff salaries are
 8 attributed to these programs?
 9 A. Not that we could compile globally.
 10 Q. Of the paid staff that World Vision employs, can you
 11 give me percentages as to how many people are assigned to
 12 each of these programs?
 13 A. Do you mean globally?
 14 Q. Yes.
 15 A. No.
 16 Q. How about for World Vision U.S.?
 17 A. Yes, and that functional -- well, it would be
 18 difficult to attribute number of staff.
 19 Q. Now, World Vision also publishes a gift catalog. I
 20 think you alluded to that.
 21 A. Mm-hmm.
 22 Q. And the catalog offers gifts for the purchaser to
 23 send to poor countries, right?
 24 A. Mm-hmm.
 25 Q. Is that a yes?

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1 A. Yes. To clarify, I would say it's representative of
 2 kinds of interventions that we would undertake. So it
 3 might not be given to a community in the form of an actual
 4 goat, for instance. Yes, we do that, but we also say that
 5 this is representative of food or livelihood programs.
 6 And if we don't need all the goats we get for it, we'll
 7 put your money into something that's similar.
 8 Q. Is the gift catalog available online?
 9 A. Yes, it is.
 10 Q. And am I correct that there are things in the gift
 11 catalog like a cow, a goat?
 12 A. Yes.
 13 Q. A well?
 14 A. Yes.
 15 Q. Clothing?
 16 A. I don't recall that specific one, but it could be.
 17 Q. And one of the gifts is a Bible, isn't it?
 18 A. Yes, our Faith in Action Bible.
 19 Q. And that's the only religious tract that you sell in
 20 the catalog, correct?
 21 MR. O'BAN: Object to form. Tract? Is
 22 that what you said?
 23 MS. LONNQUIST: Tract.
 24 A. Well, I would not say that, because we consider all
 25 the things that we do in our mission part of our spiritual

1 Q. (By Ms. Lonnquist) And again, I'm using that term
 2 inherently religious as the government defines it as that
 3 you provide religious services, that you provide religious
 4 instruction, and that you proselytize.
 5 Are your donors informed that as part of the
 6 programs for the poor that you run, that you also provide
 7 the recipients with religious instruction, religious
 8 worship and proselytizing?
 9 A. Yes, with the exception of proselytizing, because we
 10 don't do that.
 11 Q. And how are the donors notified that you're providing
 12 religious worship and training?
 13 A. They might be communicated right up front with here's
 14 the full scope of activities that we would undertake in
 15 our program, spiritual nature along with ABC.
 16 And then after the fact, depending on how
 17 specific a donor's gift was, we would report back to them
 18 what actually happened within projects. When it's in a
 19 sponsorship program with a sponsor, it would be describing
 20 like the annual report that we talked about earlier.
 21 Q. How about your direct mail solicitation? Does it
 22 include statements that part of your program is to include
 23 religious worship and training?
 24 A. That spiritual nature could happen, and I suppose
 25 that would depend on the actual appeal. If it was matched

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1 mission, and I use spiritual and religious
 2 interchangeably.
 3 Q. (By Ms. Lonnquist) I'll use a different word than
 4 tract.
 5 It's the only religious book that's listed in the
 6 catalog, isn't it?
 7 A. It might be.
 8 Q. With respect to the volunteer programs operated by
 9 World Vision U.S., as to the staffing of these various
 10 programs that you run is there a ratio of paid staff to
 11 volunteers?
 12 A. Well, there probably is, but I'm not familiar with
 13 it.
 14 Q. Do World Vision volunteers deliver Bibles to the
 15 recipients of your other programs?
 16 A. They could.
 17 Q. But it's not a requirement?
 18 A. It depends on the situation that we're trying to
 19 minister within.
 20 Q. Let's talk a minute about the donors, what kind of
 21 information you provide to the donors.
 22 Are donors uniformly informed of the inherently
 23 religious nature of any program that you run?
 24 MR. O'BAN: Object to form.
 25 A. Because we're inherently religious, yes.

1 to a government grant, then we wouldn't say that that was
 2 part of that particular appeal.
 3 Q. Going back to the 15 program areas, in how many of
 4 those programs do you receive government funds? Do you
 5 want me to go through them?
 6 A. Yes.
 7 Q. You've already identified poverty in the U.S.
 8 A. Yes. I could tell you whether some portion could be
 9 government or not.
 10 Q. Micro enterprise development?
 11 A. Yes, there could be some there.
 12 Q. And you can get that information for me?
 13 A. We could get you grants that have that intent in
 14 them, yes, mm-hmm.
 15 Q. Child sponsorship?
 16 A. Well, yes, we could integrate child sponsorship
 17 funding in areas where we have grants.
 18 Q. Water and food programs?
 19 A. Yes.
 20 Q. Medical care programs?
 21 A. Yes.
 22 Q. Children in crisis?
 23 A. Yes.
 24 Q. Clothing and shelter?
 25 A. Clothing probably wouldn't be funded with a

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1 government grant. Some sort of shelter might be. It
 2 would depend, and that might not be obvious in the grant
 3 category.
 4 Q. Agriculture and livestock?
 5 A. Yes.
 6 Q. HIV/AIDS?
 7 A. Yes.
 8 Q. Education?
 9 A. Yes, but it would probably be specialized kinds of
 10 education.
 11 Q. Girls and women?
 12 A. Yes, but that might not be clear from the topic of
 13 the grant.
 14 Q. Christian witness?
 15 A. No.
 16 Q. Relief response?
 17 A. Yes.
 18 Q. Partnership with churches?
 19 A. No.
 20 Q. Public awareness?
 21 A. There is a component of that that might be lumped on
 22 the financials in public awareness. I can't remember. On
 23 that second page there's technical services that our teams
 24 would provide under the grant, and it might be part of
 25 that bucket. So grant funds could cover some of those if

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1 they're related with the grant directly or indirectly.
 2 Q. I want to talk about the partner organizations and
 3 how World Vision gets them, selects them and restricts
 4 them, if you do.
 5 MR. O'BAN: Counsel, we've gone a little
 6 over an hour.
 7 MS. LONNQUIST: Well, let me get through
 8 this. I don't want to keep taking -- I'd like to get
 9 through before 5:00. Let's take just five minutes.
 10 (Recess taken.)
 11 Q. (By Ms. Lonnquist) With respect to the contributing
 12 corporations and foundations, do you provide any of these
 13 organizations, the corporations and the foundations, with
 14 your Statement of Faith?
 15 A. I don't know for sure, but we could find out.
 16 Q. And it's certainly not a requirement for contributing
 17 to World Vision that they adhere to the Statement of
 18 Faith, is it?
 19 A. No.
 20 Q. You take money from anyone?
 21 A. No, actually, we wouldn't. If they wanted us to do
 22 something that didn't fulfill our purpose and was
 23 misaligned, we would say no.
 24 Q. What do you mean misaligned?
 25 A. Meaning it was contradictory to our mission, meaning

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1 it undermined our integrity as Christians.
 2 Q. Like what? Can you give an example?
 3 A. Well, for instance, in our partnering protocols with
 4 corporations, we would think very carefully about
 5 accepting a gift from maybe a gambling organization.
 6 Q. Playboy, for example?
 7 A. Right, right, something that would, yeah, hurt our
 8 reputation.
 9 MR. O'BAN: What was that last one?
 10 MS. LONNQUIST: Playboy.
 11 Q. (By Ms. Lonnquist) And are these partnering protocols
 12 written down?
 13 A. Yes.
 14 Q. Are they on the Web?
 15 A. I don't believe so.
 16 Q. Do donors receive any statement or notification about
 17 World Vision's hiring practices based on religious
 18 beliefs?
 19 A. I don't believe so. Well, let me just qualify that
 20 it's an indirect communication, but we always tell donors
 21 that we're a Christian organization. So by inference, I
 22 suppose they could infer, and many do, that we hire
 23 Christians. And they'd have to go to the Web site to
 24 actually see -- you know, look for a job and see here's
 25 the...

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1 Q. You don't directly notify them of your standards of
 2 conduct, do you? Donors, I'm talking about.
 3 A. No, not if they're employee-based codes of conduct.
 4 Q. Does World Vision screen its volunteers for any
 5 impermissible sexual conduct?
 6 A. I'm uncertain, but we could check that practice
 7 easily. By virtue of the fact we ask them to sign our
 8 Statement of Faith, if they were inappropriately behaving,
 9 I believe we would be appropriate to say something to them
 10 and stop allowing them to carry out that activity for us.
 11 Q. And acting inappropriately includes sexual relations
 12 outside of a heterosexual monogamous relationship,
 13 correct?
 14 A. Say that again? I'm sorry.
 15 Q. I'm not sure I can. I think he can read it back.
 16 (The question was read back as requested.)
 17 A. That's correct.
 18 Q. (By Ms. Lonnquist) Do you have any idea what
 19 percentage of your volunteers are ordained ministers?
 20 A. No, I don't.
 21 Q. How about your staff? Do you have any idea what
 22 percentage of your staff is?
 23 A. I don't personally know, but we could probably get
 24 that.
 25 Q. We've talked about that you have staff that writes